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UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA AT ANCHORAGE

THREE BEARS ALASKA, INC.

Plaintiff,

v.

VARILEASE FINANCE, INC.,

Defendant.

**NOTICE OF REMOVAL**

Case No. \_\_\_\_\_

TO: Judges of the United States District Court

AND TO: Jennifer Coughlin & Joan Travostino  
420 L. Street, Suite 400  
Anchorage, AK 99501

You are hereby notified pursuant to 28 U.S.C. § 1332, 28 U.S.C. § 1441 and 28 U.S.C. § 1446 as follows:

1. That the above-named Defendant, Varilease Finance, Inc., ("Varilease") incorporated in Michigan, has this day filed in the United States District Court for the District of Alaska at Anchorage this Notice of Removal to said District Court of the action

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brought by Three Bears Alaska, Inc. ("Three Bears") in the Superior Court for the State of Alaska Third Judicial District at Anchorage, Case No. 3AN-15-4670CI;

2. That Varilease has also filed Notice of Removal with the Clerk of the Superior Court for the State of Alaska, Third Judicial District at Anchorage; and,

3. That said action has thereby been removed from the Superior Court for the State of Alaska, Third Judicial District at Anchorage to the United States District Court, District of Alaska at Anchorage.

Defendant submits the following grounds for removal:

1. Three Bears is the Plaintiff and Varilease is the Defendant in a case filed on January 27, 2015 in the Superior Court for the State of Alaska, Third Judicial District at Anchorage, Case No. 3AN-15-4670CI. A copy of the Complaint is contained in a copy of the State Court record which will be filed upon receipt from the Superior Court in Anchorage.

2. Plaintiff Three Bears is an Alaskan corporation with its physical address in Wasilla, Alaska.

3. Defendant Varilease is a Michigan corporation with its physical address in Salt Lake City, Utah.

4. Plaintiffs are seeking trebled damages of amounting to approximately \$1.5 million, an amount within the jurisdictional limits of this Court.

5. The initial pleading setting forth the claim for relief was filed on January 27, 2015, and received by Varilease by mail thereafter.

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6. Fewer than 30 days have elapsed since the receipt by Defendant of a copy of the initial pleading setting forth Plaintiffs' claims for relief.

7. This Court has jurisdiction pursuant to 28 U.S.C. § 1332.

DATED: February 25, 2015

GARVEY SCHUBERT BARER  
Attorneys for Defendant

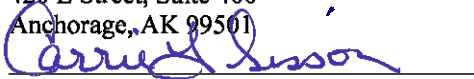


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CERTIFICATE OF SERVICE

The undersigned certifies that on the 25<sup>th</sup> day of February, 2015, a true and correct copy of the foregoing was served by ☒ USPS, ☐ Courier, ☐ E-mail, ☐ Facsimile on the following:

Jennifer M. Coughlin  
Joan M. Travostino  
K&L Gates, LLP  
420 L Street, Suite 400  
Anchorage, AK 99501



GSB:5004819.1

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